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March 29, 2013

Honorable Brian M. Cogan
United States District Court
225 Cadman Plaza
Brooklyn, NY 11201

Dear Judge Cogan,

RE: United States of America v. Steve Dove 12 CR 391(BMC)

I am counsel for the defendant, Mr. Steve Dove.

I am in receipt of a motion in limine from the prosecution requesting that the uncover officer be allowed to testify without mentioning his true name but just his badge number.

My position is before the Court considers the prosecution's application, a hearing should be held where the uncover agent could testify as to the reasons why it is necessary for the requested precautions.

In deference to the concerns of the prosecution, the transcript of the agent's testimony would be placed under seal. Presently the record is barren of any specific reasons except general references by the Mr. Nitze without an affidavit or evidence of the need for the relief urged.

After hearing the agent's sworn testimony, the Court and counsel would have a better opportunity to evaluate the government's application.

– 2 –

March 29, 2013

Respectfully submitted,

/S/

MARTIN J. SIEGEL

MJS/gk

Cc- Samuel P. Nitze, Esq.
US Attorney's Office
Via ECF